

1 PARSONS BEHLE & LATIMER
2 Jim B. Butler, Nevada Bar ID No. 8389
3 Ashley C. Nikkel, Nevada Bar ID No. 12838
4 50 West Liberty Street, Suite 750
5 Reno, NV 89501
6 Telephone: 775.323.1601
7 Facsimile: 775.348.7250
8 jbutler@parsonsbehle.com
9 anikkel@parsonsbehle.com

10 *Attorneys for Defendant*
11 *KG Mining (Bald Mountain) Inc.*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 LAURA LEIGH, individually, and WILD
15 HORSE EDUCATION, a non-profit
16 corporation,

17 Plaintiffs,

18 vs.

19 INTERIOR BOARD OF LAND APPEALS,
20 UNITED STATES DEPARTMENT OF
21 INTERIOR, BUREAU OF LAND
22 MANAGEMENT, and KG MINING INC.,

23 Defendants.

Case No. 3:25-cv-00039-ART-CSD

STIPULATION TO EXTEND TIME TO
RESPOND TO PETITION FOR REVIEW
(First Request)

24 Pursuant to Local Rules IA 6-1 and 7-1, Plaintiffs Laura Leigh and Wild Horse Education
25 (“Plaintiffs”); Defendants Interior Board of Land Appeals, United States Department of Interior,
26 Bureau of Land Management (“Federal Defendants”); and Defendant KG Mining (Bald Mountain)
27 Inc.¹ (“KG Mining”) hereby stipulate, agree, and respectfully request the Court extend the deadline
28 for KG Mining to respond to the Petition for Review (ECF No. 1) (“Petition”) **from March 7,**
2025, to March 20, 2025.

29 The response deadline for Federal Defendants is currently March 10, 2025. KG Mining
30 participated in the underlying administrative appeal as an intervenor. In this action, the Petition
31 challenges the Interior Board of Land Appeals’ decision denying Plaintiffs’ standing to bring an

¹ Plaintiffs have named “KG Mining Inc.” as a Defendant, but no such entity exists.

administrative appeal. In light of this procedural posture, KG Mining and Federal Defendants agree the Federal Defendants should respond to the Petition first. KG Mining will respond ten (10) days after the Federal Defendants' response. Plaintiffs do not oppose this request.

The parties do not seek this extension for the purposes of delay and this is the first request for an extension of time for KG Mining to respond to the Petition. Accordingly, the parties request that the Court grant KG Mining an extension of time to respond to the Complaint until **March 20, 2025**.

DATED: March 4, 2025.

GREENFIRE LAW, PC

/s/ Jessica L. Blome

Jessica L. Blome, Esq. (*pro hac vice*)

J. Rae Lovko, Esq. (*pro hac vice*)

2748 Adeline St., Suite A

Berkeley, CA 94703

jblome@greenfirelaw.com

rlovko@greenfirelaw.com

and

Brent M. Resh, Nevada Bar ID No. 14940

BRENT RESH LAW, PLLC

2104 La Solana Way

Las Vegas, NV 89102

brent@brentreshlaw.com

Attorneys for Plaintiffs

DATED: March 4, 2025.

UNITED STATES ATTORNEY

/s/ Nicole R. Leibow

Sue Fahami, Nevada Bar ID No. 5634

Acting United States Attorney, District of Nevada

Patrick A. Rose, Nevada Bar ID No. 5109

Assistant United States Attorney

Nicole R. Leibow, NY Bar ID No. 5583174

Assistant United States Attorney

501 Las Vegas Blvd. So., Suite 1100

Las Vegas, Nevada 89101

(702) 388-6336

Patrick.Rose@usdoj.gov

Nicole.Leibow@usdoj.gov

Attorneys for Federal Defendants

DATED: March 4, 2025.

PARSONS BEHLE & LATIMER

/s/ Ashley C. Nikkel

Jim B. Butler, Nevada Bar ID No. 8389

Ashley C. Nikkel, Nevada Bar ID No. 12838

50 West Liberty Street, Suite 750

Reno, NV 89501

jbutler@parsonsbehle.com

anikkel@parsonsbehle.com

Attorneys for Defendant KG Mining (Bald Mountain) Inc.

IT IS SO ORDERED.

Dated: _____, 2025.

UNITED STATES DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the law firm of Parsons Behle & Latimer and that on the 4th day of March, 2025, I filed a true and correct copy of the foregoing document, **STIPULATION TO EXTEND TIME TO RESPOND TO PETITION FOR REVIEW (First Request)**, with the Clerk through the Court's CM/ECF system, which sent electronic notification to all registered users as follows:

Brent M. Resh, Esq.
Brent Resh Law, PLLC
2104 La Solana Way
Las Vegas, NV 89102
Email: brent@brentreshlaw.com

Attorneys for Plaintiffs

Jessica L. Blome, Esq.
J. Rae Lovko, Esq.
Greenfire Law, PC
2748 Adeline St., Suite A
Berkeley, CA 94703
Email: jblome@greenfirelaw.com
Email: rlovko@greenfirelaw.com

Attorneys for Plaintiffs

Sue Fahami, Esq.
Patrick A. Rose, Esq.
Nicole Leibow, Esq.
United States Attorney's Office
501 Las Vegas Blvd., Suite 1100
Las Vegas, NV 89101
Email: patrick.rose@usdoj.gov
Email: nicole.leibow@usdoj.gov

Attorneys for Federal Defendants

/s/ Roni L. Shaffer
Employee of Parsons Behle & Latimer